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June 5, 2020

VIA ECF

The Hon. Analisa Torres, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Edgefield Holdings, L.L.C. v. Einbinder & Dunn, L.L.P.*
Case No.: 1:20-cv-00074-AT

Dear Judge Torres:

This firm is the named defendant and counsel in the above-captioned case. On April 1, 2020, Your Honor scheduled an initial pretrial conference to be held on June 16, 2020, at 11:00 a.m., and further ordered the parties to submit their joint letter and proposed case management plan by June 9, 2020. (Doc. No. 38) We are submitting this letter to respectfully request a continued adjournment of these dates due to the COVID-19 outbreak.

As set out in our April 1, 2020 letter (Doc. No. 37) which predicated Your Honor's April 1, 2020 order, we are currently unable to access our full case file in this matter maintained at our New York City office as a result of the Governor's Executive Order ordering non-essential businesses like law firms to close. We still do not know when business activities in New York City might return sufficiently to normal to allow us to access them. Given this, any proposed discovery schedule would be manifestly difficult, if not impossible, for our office to comply with and would significantly prejudice our defense of this case. For this reason, we submit that there is good cause to further adjourn the initial pretrial conference and related initial submissions (including those setting a discovery schedule) for the next two months.

Prior to sending this letter, we contacted plaintiff's counsel and they consented to this adjournment. These dates were previously extended by approximately one month by Your Honor's order dated February 27, 2020 (Doc. No. 34) because plaintiff's New York counsel had

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not yet appeared in this case by the original date for joint initial submissions set by Your Honor. (This case was transferred from Northern District of Texas, Dallas Division.) These dates were then extended by approximately two months by Your Honor's order dated April 1, 2020 (Doc. No 38) because of the same issues outlined herein related to the COVID-19 outbreak.

Based on the foregoing, we respectfully request that the initial pretrial conference, and the submission date for the parties' joint letter and proposed case management plan, each be adjourned for two months (with the possibility of additional adjournments as future conditions warrant).

Thank you in advance for your consideration of this application.

Respectfully,

/s/ Stephanie J. Blumstein
Stephanie J. Blumstein

cc: Dina Leah Hamerman, Esq. (via ECF)
Cassandra M. Vogel, Esq. (via ECF)
Charles W. Gameros, Jr., Esq. (via ECF)

GRANTED. The initial pretrial conference scheduled for June 16, 2020 is ADJOURNED to **August 5, 2020, at 11:40 a.m.** By **July 29, 2020**, the parties shall submit their joint letter and proposed case management plan.

SO ORDERED.

Dated: June 5, 2020
New York, New York



ANALISA TORRES
United States District Judge

